

BRANDON J. BRODERICK, ESQ  
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Attorney for Plaintiff(s)  
201-853-1505

DATE FILED	5-24-17
PAYMENT#	10729
CA	CK CC MO CG
AMOUNT	250
PAYOR	Broderick
BATCH/REF/CASE#	259

AHAMED RALLY,  
Plaintiff(s),  
vs.

ROBERT KIRKBRIDE, CON-WAY  
FREIGHT INC, AND JOHN DOE 1-10  
(fictitiously named) and ABC  
Co. 1-10 (fictitiously named)  
Defendant(s).

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY

DOCKET NO. BER-L- 3674-17

CIVIL ACTION

COMPLAINT  
and  
JURY DEMAND

MAY 24 2017

The Plaintiff, Ahamed Rally, residing at 127 Bay Street, 2F, Brooklyn, Kings County, New York, by way of Complaint against the Defendants says:

FIRST COUNT

1. On or about the 23rd day of June, 2015, Plaintiff, Ahamed Rally, was injured in a motor vehicle accident which occurred on Essex Street at the intersection of Summit Avenue, Hackensack, Bergen County, New Jersey.

2. At the above time and place, the Defendant, Robert Kirkbride, residing at 15 Thompson Avenue, Ludlow, Windsor County, Vermont, was operating a motor vehicle with the permission and consent, expressed or implied or in capacity as agent, servant or employee of the owner Defendant, Con-Way Freight Inc, residing at

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CIVIL DIVISION  
CASE PROCESSING  
DEPUTY CLERK

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3200 Industries Road, Richmond, Wayne County, Indiana and/or P.O. BOX 6046, Portland, Multnomah County, Oregon, traveling on Essex Street at the intersection of Summit Avenue, Hackensack, Bergen County, New Jersey.

3. At the above time and place, the Defendants so carelessly, negligently and recklessly operated, maintained or repaired said vehicle so as to cause a collision with Plaintiff.

4. At the same time and place, the Defendants John Doe 1-10 (fictitiously named) and ABC Co. 1-10 (fictitiously named) their agents or assigns, so carelessly, negligently and recklessly operated, maintained or repaired said vehicle so as to cause the within collision.

5. As a direct and proximate result of the foregoing, the Plaintiff, Ahamed Rally, was caused to sustain serious and permanent injuries as more particularly defined and set forth in N.J.S.A. 39:6A-8(a), and has suffered great pain, shock, and mental anguish, and was and still is, incapacitated and will be permanently disabled, and has in the past and will in the future be caused to expend substantial sums of money for medical treatment.

**WHEREFORE**, the Plaintiff, Ahamed Rally, demands judgment for damages against the Defendants jointly and severally, together with interest and costs of suit.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of R.4:25-4, the Court is advised that Brandon J. Broderick, is hereby designated as trial counsel.

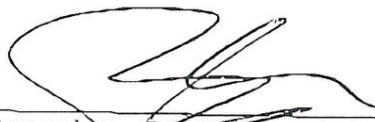
JURY DEMAND

Plaintiff hereby demands a Trial by jury as to all issues herein.

CERTIFICATION PURSUANT TO RULE 4:5-1

Pursuant to Rule 4:5-1, the undersigned certifies that the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding.

BRANDON J. BRODERICK, LLC

  
\_\_\_\_\_  
Brandon J. Broderick, ESQ.  
Attorney for Plaintiff

May 12, 2017



Appendix XII-B1



**CIVIL CASE INFORMATION STATEMENT (CIS)**

Use for Initial Law Division  
Civil Part pleadings (not motions) under Rule 4:5-1  
**Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed**

FOR USE BY CLERK'S OFFICE ONLY

PAYMENT TYPE: ☐ CK ☐ CG ☐ CA

CHG/CK NO.

AMOUNT:

OVERPAYMENT:

BATCH NUMBER:

ATTORNEY/PRO SE NAME  
Brandon J. Broderick, Esq.

TELEPHONE NUMBER  
(201) 853-1505

COUNTY OF VENUE

FIRM NAME (If applicable)  
BRANDON J. BRODERICK, LLC

DOCKET NUMBER (when available)

OFFICE ADDRESS  
90 Main Street, Suite 201  
Hackensack, NJ 07601

DOCUMENT TYPE  
COMPLAINT

NAME OF PARTY (e.g., John Doe, Plaintiff)

CAPTION

Ahamed Rally

Ahamed Rally v. Robert Kirkbride, et al.

CASE TYPE NUMBER  
(See reverse side for filing)

HURRICANE SANDY RELATED?  
☐ YES ☒ NO

IS THIS A PROFESSIONAL MALPRACTICE CASE?  
☐ YES ☒ NO

RELATED CASES PENDING?

☐ YES ☒ NO

IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.  
IF YES, LIST DOCKET NUMBERS

DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)?  
☐ YES ☒ NO

NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known)

Travelers Indemnity

☐ NONE  
☐ UNKNOWN

**THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.**

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP?  
☐ YES ☒ NO

IF YES, IS THAT RELATIONSHIP:  
☐ EMPLOYER/EMPLOYEE  
☐ FAMILIAL

☐ FRIEND/NEIGHBOR  
☐ BUSINESS  
☐ OTHER (explain)

DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY?  
☐ YES ☒ NO

USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION

DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS?  
☐ YES ☒ NO

IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION

WILL AN INTERPRETER BE NEEDED?  
☐ YES ☒ NO

IF YES, FOR WHAT LANGUAGE?

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

ATTORNEY SIGNATURE:

Side 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 605 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 508 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 611 ACTION ON NEGOTIABLE INSTRUMENT
- 612 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 899 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 899 TORT - OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 808 TOXIC TORT
- 809 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 166 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Multicounty Litigation (Track IV)**

- |  |   |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN                  | 292 PELVIC MESH/BARD                                      |
| 274 RISPERDAL/SEROQUEL/ZYPREXA             | 293 DEPUY ASR HIP IMPLANT LITIGATION                      |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL     | 295 ALLODERM REGENERATIVE TISSUE MATRIX                   |
| 282 FOSAMAX                                | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS           | 297 MIRENA CONTRACEPTIVE DEVICE                           |
| 286 LEVAQUIN                               | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR              |
| 287 YAZ/YASMIN/OCELLA                      | 300 TALC-BASED BODY POWDERS                               |
| 289 REGLAN                                 | 601 ASBESTOS  |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA  |
| 291 PELVIC MESH/GYNECARE                   |   |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category

☐ Putative Class Action

☐ Title 59